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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 CECELIA BARO,

11 Plaintiff,

12 vs.

13 THE RETAIL EQUATION,

14 Defendants.
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Case No.: 2:20-cv-00724-RFB-NJK

Compl. Filed: April 22, 2020

**ORDER GRANTING
AMENDED STIPULATION TO
EXTEND THE RETAIL
EQUATION'S TIME TO
RESPOND TO COMPLAINT**

(FIRST REQUEST)

18 This Stipulation to Extend Defendant The Retail Equation's Time to Respond to
19 Complaint is made by and between Plaintiff Cecelia Baro ("Plaintiff") and Defendant The
20 Retail Equation ("TRE") through their respective counsel, in light of the following facts:

21 RECITALS

22 A. Plaintiff filed the Complaint ("Complaint") against TRE on or about April
23 22, 2020.

24 B. TRE was served with the Complaint on or about April 28, 2020.

25 C. TRE's deadline to respond to the Complaint was May 19, 2020,

26 D. On May 13, 2020, the parties agreed that TRE could have through June 15,
27 2020, to respond to the Complaint in order to give TRE time to investigate Plaintiff's
28 claims and prepare a proper response, and for the parties to discuss a potential resolution

1 of this matter. (See Ex. A, Email exchange between Chris Jorgensen, counsel for TRE and
2 Matt Knepper, counsel for plaintiff.)

3 E. TRE prepared the original stipulation and order and e-mailed it to plaintiff
4 counsel for review and approval on May 15, 2020. TRE e-mailed again on May 27. In
5 the interim the secretary for Mr. Jorgensen, Annette Jaramillo also called several times
6 seeking approval for the stipulation. However TRE counsel was unaware that the office
7 arrangement of plaintiff counsel was in transition and counsel was not receiving these e-
8 mails and phone calls. On June 1, 2020, Mr. Jorgensen made contact with Mr. Miles
9 Clark who is associated with Mr. Knepper and was able to connect with Mr. Knepper and
10 get his approval to insert his electronic signature. The delay was not intentional nor for
11 the purpose of creating additional delay. It was simply an inadvertent administrative
12 error.

13 F. There is good cause to grant this stipulation because TRE requires
14 additional time to investigate Plaintiff's claims and prepare a proper response, and the
15 parties require additional time to consider a resolution of this matter.

16 G. This stipulation is filed in good faith and not intended to cause delay.

17 H. Pursuant to Local Rule IA 6-2 and Local Rule 7.1, Plaintiff and TRE
18 respectfully request that the Court extend TRE's time to respond to Plaintiff's Complaint
19 through June 15, 2020.

20 **STIPULATION**

21 NOW, THEREFORE, Plaintiff and TRE hereby stipulate and agree that TRE has
22 up to and including June 15, 2020, to file a response to Plaintiff's Complaint.

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26 **IT IS SO ORDERED.**

27 Dated: June 5, 2020, 2020

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UNITED STATES MAGISTRATE JUDGE